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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of )

The Use of N11 Codes and )  
Other Abbreviated Dialing )  
Arrangements )

CC Docket No. 92-105

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

REPLY COMMENTS OF THE BELL ATLANTIC TELEPHONE COMPANIES

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FILE

Most of the comments oppose the plan proposed by BellSouth of assigning N11 codes to individual enhanced service providers. N11 codes are scarce, and an ESP that is lucky enough to get one will have an unfair competitive advantage over other providers. This plan would also cause customer confusion and involve the Commission and the exchange carriers in disputes about code allocation and reclamation.

Recognizing the problems with the proposal before the Commission, Bell Atlantic<sup>1</sup> offered a different plan -- exchange carriers would not assign N11 codes to individual ESPs, but would set aside two codes for nationwide "gateways" or similar arrangements. Many of the problems identified in the comments would be avoided if the Commission adopts this proposal.

First, Bell Atlantic's plan would not give a dialing advantage to a handful of ESPs. All ESPs could be reached through the N11 gateway in the exact same way -- and in the same way in all parts of the country.

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<sup>1</sup> The Bell Atlantic telephone companies are The Bell Telephone Company of Pennsylvania, the four Chesapeake and Potomac telephone companies, Diamond State Telephone Company, The New Jersey Bell Telephone Company.

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If all the unassigned N11 codes are allocated to individual ESPs under BellSouth's proposal, then none will be available for new public service applications.<sup>2</sup> If only two of the available codes are set aside for access to an ESP gateway, however, then at least two codes in each exchange area will be available for new uses.

Other commentors are concerned that because so few codes are available and the number of potential claimants to this resource is so large, any method of allocation will generate disputes and possible litigation.<sup>3</sup> Some comments express particular skepticism about the NANPA's ability to reclaim codes, for use as NPAs or in national services applications, once those codes have been assigned to individual ESPs.<sup>4</sup> Others see Commission involvement in the allocation process as the only solution to these problems.<sup>5</sup>

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<sup>2</sup> See, e.g., Comments of the Ameritech Operating Companies at 5-6; Comments of Pacific Bell and Nevada Bell at 3; Comments of Bell Communications Research, Inc. (Bellcore) as Administrator of the North American Numbering Plan at 7-8. As these commentors suggest, there is no reason to assume that all possible public-service uses for N11 codes have been thought of already. Other applications, such as use of an N11 code for national access to TRS services, can readily be imagined.

<sup>3</sup> See, e.g., Comments of the Ameritech Operating Companies at 10; Comments of Rochester Telephone Corporation at 9.

<sup>4</sup> See Comments of BT North America, Inc. at 4; Comments of US WEST Communications, Inc. at 20; Comments of the NYNEX Telephone Companies at 10; Comments of Southwestern Bell Telephone Company at 9-10.

<sup>5</sup> See, e.g., Comments of Sprint Corporation at 1.

These difficulties, too, are addressed by Bell Atlantic's gateway approach. The gateway will accommodate an almost unlimited number of ESPs, avoiding contentious disputes over allocation of codes and the need for Commission involvement in defining allocation methods and resolving complaints. And because other N11 codes will remain available for other uses, the likelihood that the gateway codes will have to be recalled will be greatly reduced.

Other commentators point out that customer confusion will result from local assignment of the same N11 code to different ESPs in different exchange areas. This problem, too, will be avoided if two codes are set aside as "national" gateways. With this approach, customers can dial the same number everywhere for access to information services.

The comments confirm that while assigning the handful of available N11 codes to individual ESPs will serve the needs of the few entities that obtain those codes, that approach will please no one else and threatens to create needless controversy. Bell Atlantic urges the Commission to encourage the deployment of N11 gateways to provide the benefits of three-digit dialing on the widest possible scale.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Reply Comments of the Bell Atlantic Telephone Companies" was served this 13th day of July, 1992, by delivery thereof by first class mail, postage prepaid, to the parties on the attached list.

  
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